

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: 415 496 6723
Fax: 650 636 9251

ROVENS LAMB LLP
Steven A. Lamb (#132534)
(slamb@rovenslamb.com)
2601 Airport Drive, Suite 370
Torrance, CA 90505
Tel: 310 536 7830

LAW OFFICES OF JENNIFER L. DODGE INC.
Jennifer L. Dodge (#195321)
(jdodgelaw@jenniferdodgelaw.com)
2512 Artesia Blvd., Suite 300D
Redondo Beach, California 90278
Tel: (310) 372.3344
Fax: (310) 861.8044

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF STEVEN A. LAMB IN
SUPPORT OF PG&E'S MEMORANDUM
OF POINTS AND AUTHORITIES IN
OPPOSITION TO CLAIMANT'S SECOND
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

Date: December 19 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

DECLARATION OF STEVEN A. LAMB

I, Steven A. Lamb, declare as follows:

1. I am an attorney with the law firm of Rovens Lamb LLP and am one of the attorneys representing PG&E Corporation ("**PG&E Corp.**") and Pacific Gas and Electric Company (the "**Utility**"), as debtors and reorganized debtors (collectively, "**PG&E**" or the "**Debtors**," or as reorganized pursuant to the Plan (as defined below), the "**Reorganized Debtors**") and am counsel of record on behalf of **Reorganized Debtors** in the State Court action entitled, *Amir Shahmirza and Komir, Inc. v. PG&E Corporation*, San Mateo Superior Court Case 18CIV06064, filed November 9, 2018 (the "State Court Action").

2. I make this Declaration in support of The Reorganized Debtors' Opposition to the Second Motion for Summary Judgment of Claimant Amir Shahmirza ("**Claimant**").

3. I deposed Amir Shahmirza, individually and on behalf of Komir, Inc., pursuant to FRCP 30(b)(6) on October 12, 2023. A true and correct copy of extracts of the deposition transcript, together with exhibits 6-8, and 15, is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 2nd day of November 2023 at Torrance, California.

By: S.A. Lamb
Steven A. Lamb